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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 LEIDA PANGINDIAN, an individual,
11 Plaintiff,

12 v.

13 JOLLIBEE FOODS CORPORATION, USA,
14 INC. a Nevada Domestic Company; ROBERT
15 DENOLO, an individual; and DOES and ROE
16 entities I-X, inclusive,
17 Defendants.

Case No. 2:21-cv-00687-GMN-EJY

**STIPULATION TO DISMISS
DEFENDANT JOLLIBEE FOODS
CORPORATION, USA, INC.,
SUBSTITUTE HONEYBEE FOODS
CORPORATION, AND TO EXTEND
TIME FOR DEFENDANTS TO
RESPOND TO THE COMPLAINT**

[FIRST REQUEST]

18 Plaintiff LEIDA PANGINDIAN (“Plaintiff”) and Defendants JOLLIBEE FOODS
19 CORPORATION (USA)¹(“Jollibee”) and ROBERT DENOLO (“Denolo”), by and through their
20 attorneys of record, hereby stipulate as follows:

21 Jollibee did not employ Plaintiff, is not a proper party to this action, and the parties
22 accordingly agree that Jollibee should be dismissed from this action with prejudice. Honeybee
23 Foods Corporation (“Honeybee”) employed Plaintiff and is the proper party to this action.²
24 Accordingly, the parties respectfully request an order dismissing Defendant Jollibee and
25 substituting Honeybee as defendant in its place. The parties agree that the caption of this matter

26
27 ¹ Jollibee’s correct name is Jollibee Foods Corporation (USA).

28 ² Littler Mendelson also represents Honeybee Foods Corporation and will accept service of
the summons and complaint in this matter on behalf of Honeybee.

1 will be revised in accordance with this stipulation. The parties further agree that, because the action
2 is ongoing between Plaintiff, Denolo, and Honeybee, no determination of responsibility for fees
3 and costs is necessary at this time.

4 In light of the above-stipulation, the parties respectfully request that Defendants be granted
5 a one-week extension to respond to the Complaint so that dismissal of Jollibee and substitution of
6 Honeybee as defendant can be effectuated prior to the requirement to file a responsive pleading. If
7 the requested extension is granted, Defendants will file their response on or before May 10, 2021.
8 This is the first request for an extension made by the parties and the parties make this request in
9 good faith and not for the purpose of delay.

10 Dated: April 29, 2021

Dated: April 29, 2021

12 /s/ Trevor J. Hatfield

13 TREVOR J. HATFIELD
14 HATFIELD & ASSOCIATES, LTD

15 *Attorney for Plaintiff*

/s/ Amy L. Thompson

13 ROGER L. GRANDGENETT II
14 AMY L. THOMPSON
LITTLER MENDELSON, P.C.

Attorneys for Defendants

17 **ORDER**

18 **IT IS SO ORDERED.**

19 Dated: April 29, 2021

22 
23 UNITED STATES DISTRICT JUDGE

24 4850-7967-3575.1 / 111725-1001